



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

REGION 2

290 BROADWAY

NEW YORK, NY 10007-1866

**APR 19 2016**

**CERTIFIED MAIL-RETURN RECEIPT REQUESTED**

**Article Number: 7015 3010 0000 7503 6910**

Mr. Michael Orgera, Licensed Operator  
Department of Public Works  
Township of Little Falls  
225 Main Street  
Little Falls, New Jersey 07424

Re: **Request for Information ("RFI") Pursuant to Section 308 of the Clean Water Act**  
**Docket No. CWA-IR-16-017**  
**Sanitary Sewer System Compliance Evaluation Inspection**  
**Township of Little Falls Sanitary Sewer System**  
**NJPDES Tracking ID No. NJP000147**

Dear Mr. Orgera:

As part of a joint effort between the United States Environmental Protection Agency ("EPA") and the New Jersey Department of Environmental Protection ("NJDEP") to ensure that the discharge of sanitary sewage is minimized, we conducted a Sanitary Sewer System ("SSS") Compliance Evaluation Inspection ("CEI") of the Township of Little Falls system on March 22, 2016. Enclosed is a copy of the CEI report detailing EPA's findings.

The EPA is charged with the protection of human health and the environment under the Clean Water Act ("CWA" or "Act"), 33 U.S.C. §§ 1251 *et seq.* Section 308(a) of the CWA, 33 U.S.C. § 1318(a), provides that whenever it is necessary to carry out the objectives of the CWA, including determining whether or not a person/agency is in violation of Section 301 of the CWA, 33 U.S.C. § 1311, the EPA shall require the submission of any information reasonably necessary to make such a determination. Under the authority of Section 308 of the CWA, EPA may require the submission of information necessary to assess the compliance status of any facility and its related appurtenances.

Within **thirty (30) calendar days** of receipt of this RFI, the Township is hereby required, pursuant to Section 308(a) of the Clean Water Act, 33 U.S.C. § 1318(a), to submit to EPA a detailed written summary of the steps the Township has taken or will take to address each of the **Areas of Concern** detailed in the enclosed CEI Report.

All information required to be submitted by this RFI shall be sent by certified mail or its equivalent to:

Douglas McKenna, Chief  
Water Compliance Branch  
Division of Enforcement and Compliance Assistance  
U.S. Environmental Protection Agency – Region 2  
290 Broadway, 20<sup>th</sup> Floor  
New York, NY 10007-1866

Any documents to be submitted by the Township must be sent by certified mail or its equivalent and shall be signed by an authorized representative of the respective entity (see 40 C.F.R. § 122.22), and shall include the following certification:

“I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitted false information, including the possibility of fine and imprisonment for knowing violations.”

Failure to provide the required information may subject the Township to civil/criminal penalties pursuant to Section 309 of the CWA. Failure to comply with the RFI shall also subject the facility to ineligibility for participation in work associated with Federal contracts, grants or loans.

Additionally, further guidance and information concerning the control of Sanitary Sewer Overflows (SSOs) may be found by accessing the following EPA web site: <https://www.epa.gov/npdes/sanitary-sewer-overflows-ssos>.

If you have any questions, please feel free to contact Ms. Kimberly McEathron, of my staff, at (212) 637-4228 or via email at [mceathron.kimberly@epa.gov](mailto:mceathron.kimberly@epa.gov).

Sincerely yours,

A handwritten signature in blue ink, appearing to read 'D. McKenna', with a long horizontal flourish extending to the right.

Douglas McKenna, Chief  
Water Compliance Branch

w/enclosures

cc: Marcedius Jameson, NJDEP  
Darlene Conti, Mayor, Township of Little Falls  
Melissa Hornsby, NJDEP ([Melissa.Hornsby@dep.nj.gov](mailto:Melissa.Hornsby@dep.nj.gov))  
Rich Paull, NJDEP ([Rich.Paull@dep.nj.gov](mailto:Rich.Paull@dep.nj.gov))  
Theophilus Ashie, NJDEP ([Theophilus.Ashie@dep.nj.gov](mailto:Theophilus.Ashie@dep.nj.gov))  
Bridget McKenna, PVSC ([BMcKenna@PVSC.com](mailto:BMcKenna@PVSC.com))

# Water Compliance Inspection Report

## Section A: National Data System Coding (i.e., PCS)

Transaction Code		NPDES										yr/mo/day					Inspection Type		Inspector		Fac Type	
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21		
		N	J	P	0	0	0	1	4	7		1	6	0	3	2	&	R	1			
Remarks																						
21																						
Inspection Work Days		Facility Self-Monitoring Evaluation Rating										BI		QA		-----Reserved-----						
67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87		
0	1	0	1	0	1	0	1	0	1	0	0	1	0	1	0	1	0	1	0	1		

## Section B: Facility Data

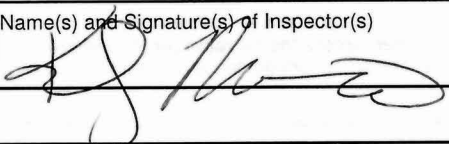
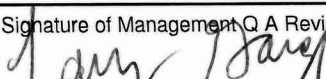
Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number)  Township of Little Falls 70 Sindler Avenue Little Falls, New Jersey 07424	Entry Time/Date  8:00 AM / 03/22/2016	Permit Effective Date
	Exit Time/Date  10:45 AM / 03/22/2016	Permit Expiration Date
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)  Michael Orgera, Licensed Operator Township of Little Falls 70 Sindler Avenue Little Falls, New Jersey 07424 Phone: (973) 256-6815	Other Facility Data (e.g., SIC NAICS, and other descriptive information)	
Name, Address of Responsible Official/Title/Phone and Fax Number  Michael Orgera, Licensed Operator Township of Little Falls 70 Sindler Avenue Little Falls, New Jersey 07424 Phone: (973) 256-6815	<div style="text-align: center;"> <b>Contacted</b>  <input checked="checked" type="checkbox"/> Yes   <input type="checkbox"/> No         </div>	

## Section C: Areas Evaluated During Inspection (Check only those areas evaluated)

<input type="checkbox"/>	Permit	<input type="checkbox"/>	Self-Monitoring Program	<input type="checkbox"/>	Pretreatment	<input type="checkbox"/>	MS4
<input type="checkbox"/>	<b>Records/Reports</b>	<input type="checkbox"/>	Compliance Schedules	<input type="checkbox"/>	Pollution Prevention		
<input checked="" type="checkbox"/>	Facility Site Review	<input type="checkbox"/>	Laboratory	<input type="checkbox"/>	Storm Water		
<input type="checkbox"/>	Effluent/Receiving Waters	<input checked="" type="checkbox"/>	Operations & Maintenance	<input type="checkbox"/>	Combined Sewer Overflow		
<input type="checkbox"/>	Flow Measurement	<input type="checkbox"/>	Sludge Handling/Disposal	<input checked="" type="checkbox"/>	Sanitary Sewer Overflow		

## Section D: Summary of Findings/Comments

*(Attach additional sheets of narrative and checklists, including Single Event Violation codes, as necessary)*

SEV Codes <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>		SEV Description     
Name(s) and Signature(s) of Inspector(s) 		Agency/Office/Phone and Fax Numbers USEPA/DECA-WCB/212-637-4228
Signature of Management Q A Reviewer 		Agency/Office/Phone and Fax Numbers USEPA/DECA-WCB/212-637-3950
		Date 4/13/2016
		Date 4/14/16

## INSTRUCTIONS

### Section A: National Data System Coding (i.e., PCS)

**Column 1: Transaction Code:** Use N, C, or D for New, Change, or Delete. All inspections will be *new* unless there is an error in the data entered.

**Columns 3-11: NPDES Permit No.** Enter the facility's NPDES permit number - third character in permit number indicates permit type for U=unpermitted, G=general permit, etc.. (Use the Remarks columns to record the State permit number, if necessary.)

**Columns 12-17: Inspection Date.** Insert the date entry was made into the facility. Use the year/month/day format (e.g., 04/10/01 = October 01, 2004).

**Column 18: Inspection Type\*.** Use one of the codes listed below to describe the type of inspection:

A Performance Audit	U IU Inspection with Pretreatment Audit	! Pretreatment Compliance (Oversight)
B Compliance Biomonitoring	X Toxics Inspection	@ Follow-up (enforcement)
C Compliance Evaluation (non-sampling)	Z Sludge - Biosolids	{ Storm Water-Construction-Sampling
D Diagnostic	# Combined Sewer Overflow-Sampling	} Storm Water-Construction-Non-Sampling
F Pretreatment (Follow-up)	\$ Combined Sewer Overflow-Non-Sampling	: Storm Water-Non-Construction-Sampling
G Pretreatment (Audit)	+ Sanitary Sewer Overflow-Sampling	~ Storm Water-Non-Construction-Non-Sampling
I Industrial User (IU) Inspection	& Sanitary Sewer Overflow-Non-Sampling	< Storm Water-MS4-Sampling
J Complaints	\ CAFO-Sampling	- Storm Water-MS4-Non-Sampling
M Multimedia	= CAFO-Non-Sampling	> Storm Water-MS4-Audit
N Spill	2 IU Sampling Inspection	
O Compliance Evaluation (Oversight)	3 IU Non-Sampling Inspection	
P Pretreatment Compliance Inspection	4 IU Toxics Inspection	
R Reconnaissance	5 IU Sampling Inspection with Pretreatment	
S Compliance Sampling	6 IU Non-Sampling Inspection with Pretreatment	
	7 IU Toxics with Pretreatment	

**Column 19: Inspector Code.** Use one of the codes listed below to describe the *lead agency* in the inspection.

A — State (Contractor)	O — Other Inspectors, Federal/EPA (Specify in Remarks columns)
B — EPA (Contractor)	P — Other Inspectors, State (Specify in Remarks columns)
E — Corps of Engineers	R — EPA Regional Inspector
J — Joint EPA/State Inspectors—EPA Lead	S — State Inspector
L — Local Health Department (State)	T — Joint State/EPA Inspectors—State lead
N — NEIC Inspectors	

**Column 20: Facility Type.** Use one of the codes below to describe the facility.

- 1 — Municipal. Publicly Owned Treatment Works (POTWs) with 1987 Standard Industrial Code (SIC) 4952.
- 2 — Industrial. Other than municipal, agricultural, and Federal facilities.
- 3 — Agricultural. Facilities classified with 1987 SIC 0111 to 0971.
- 4 — Federal. Facilities identified as Federal by the EPA Regional Office.
- 5 — Oil & Gas. Facilities classified with 1987 SIC 1311 to 1389.

**Columns 21-66: Remarks.** These columns are reserved for remarks at the discretion of the Region.

**Columns 67-69: Inspection Work Days.** Estimate the total work effort (to the nearest 0.1 work day), up to 99.9 days, that were used to complete the inspection and submit a QA reviewed report of findings. This estimate includes the accumulative effort of all participating inspectors; any effort for laboratory analyses, testing, and remote sensing; and the billed payroll time for travel and pre and post inspection preparation. This estimate does not require detailed documentation.

**Column 70: Facility Evaluation Rating.** Use information gathered during the inspection (regardless of inspection type) to evaluate the quality of the facility self-monitoring program. Grade the program using a scale of 1 to 5 with a score of 5 being used for very reliable self-monitoring programs, 3 being satisfactory, and 1 being used for very unreliable programs.

**Column 71: Biomonitoring Information.** Enter D for static testing. Enter F for flow through testing. Enter N for no biomonitoring.

**Column 72: Quality Assurance Data Inspection.** Enter Q if the inspection was conducted as followup on quality assurance sample results. Enter N otherwise.

**Columns 73-80:** These columns are reserved for regionally defined information.

### Section B: Facility Data

This section is self-explanatory except for "Other Facility Data," which may include new information not in the permit or PCS (e.g., new outfalls, names of receiving waters, new ownership, other updates to the record, SIC/NAICS Codes, Latitude/Longitude).

### Section C: Areas Evaluated During Inspection

Check only those areas evaluated by marking the appropriate box. Use Section D and additional sheets as necessary. Support the findings, as necessary, in a brief narrative report. Use the headings given on the report form (e.g., Permit, Records/Reports) when discussing the areas evaluated during the inspection.

### Section D: Summary of Findings/Comments

Briefly summarize the inspection findings. This summary should abstract the pertinent inspection findings, not replace the narrative report. Reference a list of attachments, such as completed checklists taken from the NPDES Compliance Inspection Manuals and pretreatment guidance documents, including effluent data when sampling has been done. Use extra sheets as necessary.

\*Footnote: In addition to the inspection types listed above under column 18, a state may continue to use the following wet weather and CAFO inspection types until the state is brought into ICIS-NPDES: K: CAFO, V: SSO, Y: CSO, W: Storm Water 9: MS4. States may also use the new wet weather, CAFO and MS4 inspections types shown in column 18 of this form. The EPA regions are required to use the new wet weather, CAFO, and MS4 inspection types for inspections with an inspection date (DTIN) on or after July 1, 2005.

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**REGION 2, DECA-WCB**  
**20<sup>th</sup> Floor, 290 Broadway, NY, NY 10007**

**SANITARY SEWER SYSTEM**  
**COMPLIANCE EVALUATION INSPECTION REPORT**

<b>Compliance Evaluation Inspection:</b> Township of Little Falls SSS	
<b>Inspection Date:</b> March 22, 2016	
<b>Inspection Time:</b> 8:00 AM – 10:45 AM	
<b>EPA Inspector:</b> Kimberly McEathron, Physical Scientist, USEPA Region 2, (212) 637-4228	
<b>Township Representative:</b> Michael Orgera, Licensed Operator, Township of Little Falls, (973) 256-6815	
<b>Other Representative:</b> Bridget McKenna, Chief Operating Officer, Passaic Valley Sewerage Commission, (973) 817-5976	
<b>Site Information:</b>	Township of Little Falls 70 Sindle Avenue Little Falls, New Jersey 07424  NJPDES Tracking ID No. NJP000147

**I. Background and Findings**

**Collection System:**

1. The Passaic Valley Sewerage Commission (PVSC) Wastewater Treatment Plant (WWTP), New Jersey Department of Environmental Protection (NJDEP) New Jersey Pollutant Discharge Elimination System (NJPDES) No. NJ0021016, is a large sized Publicly Owned Treatment Works (POTW).
2. The PVSC WWTP treats separate sanitary sewage from the Township of Little Falls (“Little Falls” or “Township”).
3. The PVSC and the Township have an intermunicipal agreement dated September 29, 1986 regarding the conveyance and treatment of sanitary sewage.
4. Downstream from the Township, the Township’s sanitary sewage flow connects into Woodland Park’s SSS and then Totowa connects into Woodland Park’s SSS and all three (3) sources are conveyed through Woodland Park and the City of Paterson via a Woodland Park owned and operated force main into PVSC’s interceptor on Curtis Place in Paterson. Immediately adjacent to where sanitary sewage from Woodland Park, Totowa and Little Falls enters the PVSC interceptor is the City of Paterson Curtis Place Combined Sewer Overflow (CSO) outfall (001) (NJPDES No. NJ0105023) which discharges to the Passaic River during overflow events.

5. The Township and Woodland Park (formerly, West Paterson) have an intermunicipal agreement dated October 10, 1985 regarding the conveyance of sanitary sewage. Woodland Park has intermunicipal agreements with Little Falls, Totowa and the City of Paterson regarding the conveyance of sanitary sewage.
6. According to the Township representative, there is a second downstream route for sanitary sewage from approximately thirty (30) houses within the Township which connect into the Township of Montclair's collection system. The Township of Montclair is also a satellite community of PVSC's WWTP.
7. Upstream from the Township, sanitary sewage from a total of approximately fifty (50) houses from the Township of Cedar Grove and the Borough of North Caldwell connect into the Township's collection system.
8. At the time of the inspection, the Township representative was unsure the location or details regarding intermunicipal agreements with the Township of Cedar Grove, the Borough of North Caldwell or the Township of Montclair regarding sanitary sewage.
9. The Township population is approximately 17,000 residents. According to Township representatives, the Township consists of primarily residential areas.
10. The Township Sanitary Sewer System (SSS) consists of separate sanitary sewers with approximately 1,200 manholes and approximately 38 miles of sewer piping.
11. According to the Township representative, the Township SSS was originally constructed over 100 years ago and is composed of primarily of clay pipes with some PVC pipes.
12. The Township SSS map provided by the Township was dated April 2002 and was developed digitally by Crew Engineers, Inc. Pump stations, manholes and pipe segments are depicted on this map.
13. According to the Township representative, he (Michael Orgera) is the Licensed Operator of the collection system.

**Pump Stations:**

14. The Township owns, operates and maintains four (4) pump stations in the SSS (Sindle Avenue, Jackson Park, Singac and Great Notch).
15. All four (4) pump stations are equipped with alarm systems. Sindle Avenue, Jackson Park and Singac pump stations are equipped with on-site backup power generators. Great Notch pump station is equipped to be powered by a portable generator.
16. The Township conducts and documents daily pump station inspections on a daily check sheet for each station.

### **Flow Metering and Billing:**

17. The Township does not operate or maintain flow meters within the Township's SSS. The Township documents flow totalizer readings twice a day in a handwritten log utilizing the PVSC owned and operated flow meter located at the Sindle Avenue Pump Station. According to the Township representative, PVSC representatives collect the flow meter chart records on a weekly basis. At the time of the inspection, the flow was 1.720 MGD. According to flow records, the average flow for the Township is 1.53 MGD.
18. According to Township representatives, the Great Notch and Singac Pump Stations are equipped with flow meters but they are currently not operating.
19. PVSC bills the Township based on metered sanitary sewage flow rates on a quarterly basis. The Township then bills North Caldwell and Cedar Grove based on an average flow calculation.
20. The intermunicipal agreement between PVSC and Little Falls states "PVSC agrees to adopt the appropriate resolution to increase the gallonage to be received from the Township from 0.04 mgd to 2.3 mgd pursuant to law".

### **SSO Discharges / Spills:**

21. According to Township documentation, the Township has experienced three (3) Sanitary Sewer Overflows (SSOs) or spills in the past five (5) years within the collection system as detailed below:
  - a. On 3/11/2011, one of the two main pumps at the Sindle Avenue Pump Station had a "catastrophic failure due to heavy rains and flows". In order to avoid a sewerage spill into homes and businesses from surcharging sewage, the Township installed a 6 inch trash pump into the wet well and pumped approximately 80,000 gallons sanitary sewage flow into the Peckman River until the pumps were back in operation on 3/12/2011. The NJDEP was notified of this event via the hotline and in writing.
  - b. On 9/3/2011, the Woodland Park force main leak in City of Paterson required bypassing to complete repairs. Approximately 500,000 gallons of Little Falls sanitary sewage flow was bypassed into the Passaic River. According to Township's report, the Township suspected that the Hurricane and flooding undermined the force main. The NJDEP was notified of this event via the hotline and in writing.
  - c. On 2/2/2012, the force main leak in Woodland Park resulted in the backup and overflow of approximately 100,000 gallons of Little Falls sanitary sewage into the Passaic River. The NJDEP was notified of this event via the hotline and in writing.
22. The Township has a written procedure for responding to and reporting sanitary sewer overflows or spills which includes a form and documentation.
23. Sanitary sewer system spills and overflows that enter the storm sewer system would ultimately discharge to the Passaic River.

**Residential Complaints / Collection System Insurance:**

24. According to the Township representative, the Township documents any jet truck activities, including responses to residential complaints, in the jet truck usage report.
25. According to the Township representative, the Township maintains insurance for the collection system.
26. According to the Township representative, there are been no insurance claims made or paid as a result of SSOs or spills to affected property owners in the past five (5) years.

**Collection System Maintenance:**

27. According to the Township representative, the Township owns a jet truck for collection system maintenance.
28. The Township has developed a preventative maintenance program which includes daily inspections and maintenance as necessary at known trouble spots within the collection system. According to the Township's inspection form, there are thirty-one (31) problem areas included in this routine maintenance program. Example problem areas include Stevens Avenue and Fairfield Avenue.
29. According to the Township representative, the Township coordinates identified oil and grease issues with the Health Department and PVSC for the inspection and enforcement of grease traps at commercial food establishments. The Township Department of Public Works does not have a formal written Fats, Oils and Grease (FOG) program.
30. Township Ordinance Chapter 199: Sewer Use, adopted on December 18, 1995, prohibits the discharge of any wastes containing floatable fats, wax, grease, oils or any other floatable pollutants into the sanitary sewer and Ordinance Chapter 195: Sewer Connections, adopted on December 18, 1995, includes grease trap requirements.
31. The Township documents preventative maintenance in the jet truck usage report form and preventative inspections using a separate problem area form.
32. According to Township representatives, the Township sends monthly operational reports summarizing all events described in N.J.A.C. 7:10A-1.12(b) and the remedial action taken to PVSC and provided the report for February 2016 at the time of the inspection.

**Inflow and Infiltration (I/I):**

33. Township Ordinance Chapter 199: Sewer Use, adopted on December 18, 1995, prohibits inflow to the sanitary sewer, including any stormwater, surface water, groundwater, roof runoff, subsurface drainage, uncontaminated water or unpolluted waters. Chapter 199 includes enforcement and penalty authority.

34. According to a letter dated March 4, 2003 provided at the time of the inspection, the Township hired Crew Engineers, Inc. to conduct an I/I study including metering flows and smoke testing sanitary sewer lines throughout the Township as well as digitizing the Township sewer map (Crew Proj. Nos. LFDPW002). In addition, the services outlined in the project description include "miscellaneous infiltration and inflow projects identified during the study and authorized by the Township, including investigate and design repair of Island Road (Signac) sewer defect, investigate and recommend repair/replacement of sewer lines on Jacobus Avenue, and Long Hill Road. The charges for the referenced services totaled \$49,763.71. The Township representative was unable to provide documentation or a description of what work had been completed, the findings of the I/I study and what sources of I/I were eliminated. The Township representative provided EPA with an Interim Report from Crew Engineers, Inc. dated December 3, 2002. The Interim Report states that at the conclusion of the flow metering, the flowmeter data will provide Crew with sufficient information to recommend which lines should be considered for replacement. In addition, the Interim Report states that the smoke testing program revealed several sources of I/I into the Sanitary Sewer System and that most manholes are in need of repair. The attachments to the Interim Report which detail the locations of identified I/I were not provided by the Township.
35. According to the Township representative, approximately 224 manhole disc inserts have been installed within the SSS since 2008 (20 per year 2009 through 2013, 25 in 2014 and 79 in 2015). However, the Township representative was unable to provide documentation or the exact locations of installation, at the time of the inspection. EPA did not observe manhole disc inserts in the manholes viewed at the time of the inspection.
36. According to the Township representative, there are likely sources of I/I in the oldest part of the SSS which is located around the Center Avenue, Main Street and Wilmore Road area. According to the Township representative, an underdrain has been identified in this location but the exact location of the drainage and its impact on the SSS are not known. The Township plans on televising this area and may potentially do that this year, according to the Township representative.
37. The intermunicipal agreement between PVSC and Little Falls states "The Township agrees to construct a holding tank with a capacity of at least 500,000 gallons at a location and in accordance with specifications approved by PVSC." However, the referenced holding tank has not been constructed by the Township, according to the Township representative. At the time of the inspection, EPA observed a pipe extending from the Sindle Avenue Pump Station that according to the Township representative, was installed for the purposes of eventually connecting to a holding tank. At the time of the inspection, EPA observed buildings adjacent to the Sindle Avenue Pump Station where the holding tank would potentially have been located.
38. According to flow records between the weeks ending October 1, 2014 and September 30, 2015, the average flow for the Township was 1.53 MGD. According to flow records, the Township averaged 3.461 MGD during the week ending on March 18, 2015 which was the highest documented flow during this time period.

39. Because the Township's SSS consists primarily of clay pipe over 100 years old, infiltration into the system likely exists.

**Municipal Separate Storm Sewer System (MS4):**

40. The Township Department of Public Works also operates and maintains the storm sewer system.
41. The Township Ordinance Chapter 216, adopted on September 12, 2005, prohibits illicit connections and discharges to the storm sewers.

**Addendum:**

42. Subsequent to the inspection, on March 22, 2016 Mike Orgera emailed EPA stating that the manhole on 1<sup>st</sup> Avenue and Walnut Street was cleaned and included a photograph documenting the lack of rags build up seen at the time of the inspection.

**II. Summary**

Based on the information provided during the SSS CEI, the Little Falls SSS has experienced three (3) sanitary sewer overflows (SSOs) or spills in the collection system that resulted in discharges to waterbodies in the past five (5) years. Two of which were related to wet weather events. In addition, based on flow records sources of I/I contribute to higher dry weather and wet weather flows in the Little Falls SSS, see the Areas of Concern / Recommendations section below for more details.

**1. AREAS OF CONCERN / RECOMMENDATIONS**

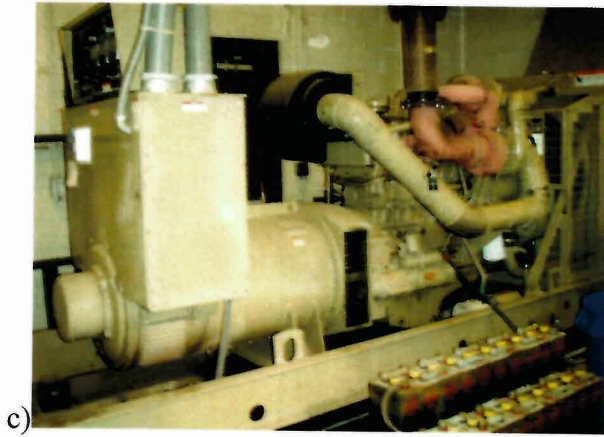
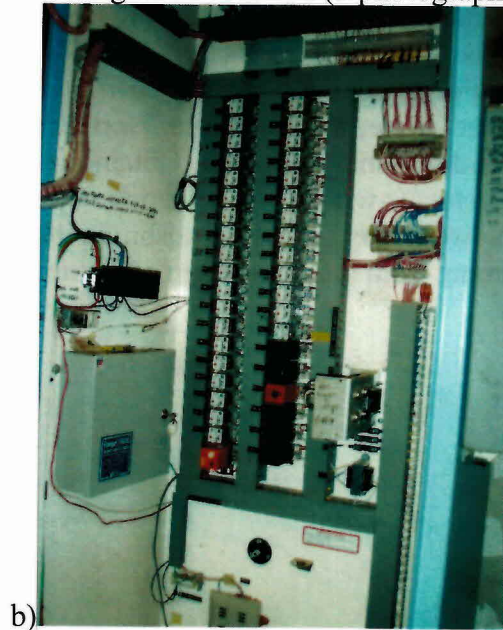
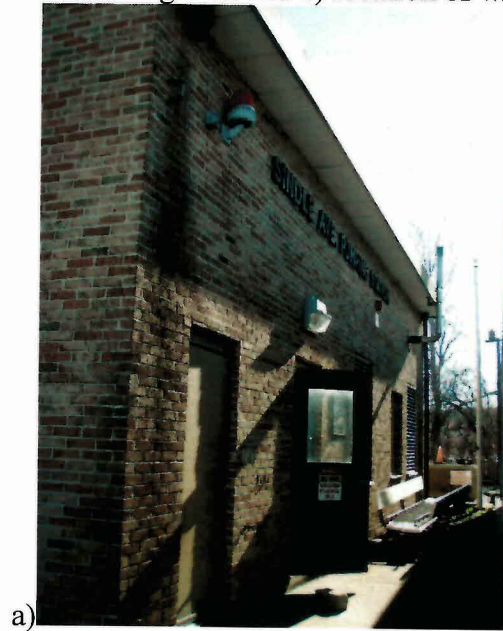
- a. Based on flow records, sources of I/I contribute to higher dry weather and wet weather flows the Little Falls SSS. The following are steps Little Falls should consider to identify and eliminate sources of inflow and infiltration into the system:
- i. Obtain and review I/I work already completed by Crew Engineers, Inc. to address any sources of I/I identified;
  - ii. Investigate and address I/I in the oldest portion of the system (around the Center Avenue, Main Street and Wilmore Road area);
  - iii. Utilize Ordinance Chapter 199: Sewer Use to prohibit inflow to the sanitary sewer, including any stormwater, surface water, groundwater, roof runoff, subsurface drainage, uncontaminated water or unpolluted waters and utilize enforcement authority to eliminate illegal connections of inflow to the sanitary sewer system.
  - iv. According to Township representatives, the Great Notch and Singac Pump Stations are equipped with flow meters but they are currently not operating. Operating flow meters within the collection system could potentially add in further identifying locations of I/I within the system.
  - v. The intermunicipal agreement between PVSC and Little Falls states "The Township agrees to construct a holding tank with a capacity of at least 500,000

gallons at a location and in accordance with specifications approved by PVSC.” However, the referenced holding tank has not been constructed by the Township, according to the Township representative. Wet weather storage would ensure that Township sanitary sewage flow is treated at PVSC’s WWTP and does not discharge out the CSO Outfall in the City of Paterson.

- vi. At the time of the inspection, the Township representative was unsure of the location or details regarding intermunicipal agreements with the Township of Cedar Grove, the Borough of North Caldwell or the Township of Montclair regarding sanitary sewage. Obtaining and reviewing the intermunicipal agreements with upstream communities, specifically Cedar Grove and North Caldwell, may aid the Township in identifying and eliminating sources of I/I coming from these upstream communities into the Little Falls SSS.

### III. Field Work

1. Sindie Avenue Pump Station; a) building, b) alarm, c) generator, d) pipe to nonexistent holding tank and e) location of where holding tank would be (5 photographs);



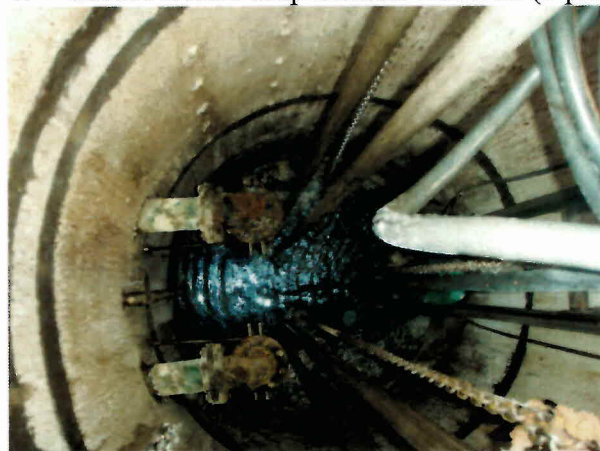
2. SSO discharge location to Peckman River at Sindie Avenue (2 photographs);



3. Jackson Park Pump Station control panel (1 photograph);



4. Great Notch Pump Station wet well (1 photograph);



5. Manhole at 18 Lincoln Avenue, low flow in channel (1 photograph);



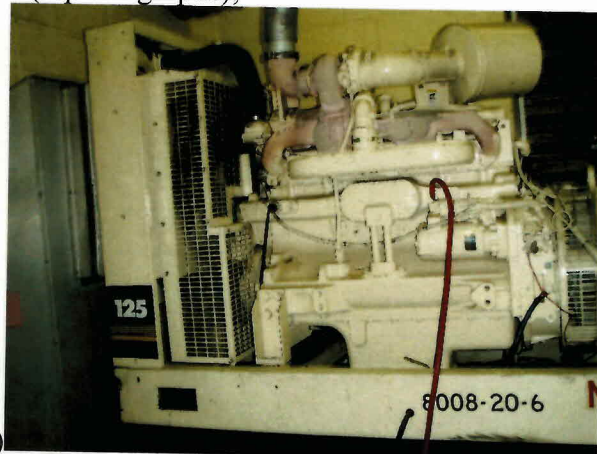
6. Manhole at 1<sup>st</sup> Avenue and Walnut street, rags build up, in need of cleaning (1 photograph);



7. Manhole at 68 Second Street, low flow in channel (1 photograph);



8. Singac Pump Station; a) building, b) generator (2 photographs);



9. Manhole on Fairfield Ave, low flow in channel (1 photograph);



10. Forcemain failure associated SSO discharge location to Passaic River (1 photograph);



